

Civil Court of the City of New York  
County of BRONX

Index Number 13405-2007

LR CREDIT 13 LLC Plaintiff(s),

PROPOSED  
WRITTEN ANSWER  
CONSUMER CREDIT TRANSACTION

-against-  
JOSE GUZMAN Defendant(s),

Defendant JOSE GUZMAN answers the Complaint as follows:

ANSWER: (Check all that apply)

1. ☒ General Denial: I deny the allegations in the Complaint.

SERVICE

2. ☒ I did not receive a copy of the Summons and Complaint.

3. ☐ I received the Summons and Complaint, but service was not correct as required by law.

DEFENSES

4. ☒ I do not owe this debt.

5. ☐ I did not incur this debt. I am a victim of identity theft or mistaken identity.

6. ☒ I have paid all or part of the alleged debt.

7. ☒ I dispute the amount of the debt.

8. ☒ I do not have a business relationship with Plaintiff (Plaintiff lacks standing).

9. ☐ The NYC Department of Consumer Affairs shows no record of plaintiff having a license to collect debt.

10. ☐ Plaintiff does not allege a debt collector's license number in the Complaint.

11. ☒ Statute of limitations (the time has passed to sue on this debt).

12. ☐ This debt has been discharged in bankruptcy.

13. ☐ The collateral (property) was not sold at a commercially reasonable price.

14. ☒ Unjust enrichment (the amount demanded is excessive compared with the original debt).

15. ☐ Violation of the duty of good faith and fair dealing.

16. ☐ Unconscionability (the contract is unfair).

17. ☐ Laches (plaintiff has excessively delayed in bringing this lawsuit to my disadvantage).

18. ☐ Defendant is in the military.

19. ☐ Other \_\_\_\_\_

OTHER

20. ☐ Please take notice that my only source of income is \_\_\_\_\_, which is exempt from collection.

COUNTERCLAIM(S)

21. ☐ Counterclaim(s): \$ \_\_\_\_\_ Reason: \_\_\_\_\_

State of New York, County of Suffolk BRONX ss: VERIFICATION

JOSE GUZMAN, being duly sworn, deposes and says: I have read the Answer in Writing and know the contents to be true from my own knowledge, except as to those matters stated on information and belief, and as to those matters I believe them to be true.

Sworn to before me this 27 day of July, 2015.

Donna Romano  
Notary/Court Employee

DONNA A. ROMANO  
Notary Public, State of New York  
Qualified in Suffolk County  
No. 01RO6259418  
My Commission Expires 4/9/16

Jose J. Guzman  
Signature of Defendant

20 W EUCLID ST 1  
Defendant's address

This case is scheduled to appear on the calendar as follows:

VALLEY STREAM NY 11580

Date: \_\_\_\_\_ Part: \_\_\_\_\_ Room: \_\_\_\_\_ Time: \_\_\_\_\_ Both sides notified \_\_\_\_\_

CIV-GP- 58b Written Answer Consumer Credit (12/08)

FREE CIVIL COURT FORM

No fee may be charged to fill in this form.

Form can be found at: <http://www.nycourts.gov/courts/nyc/smallclaims/forms.shtml>

Prepared with the assistance of the Bronx CLARO Program by GALENTES